

EXHIBIT “A”

E [REDACTED] B [REDACTED]

1

1 IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY

2 - - -

3 E.B. : May Term, 2017

4 vs. :

5 MOTEL 6 OPERATING, L.P., :
6 et al. : No. 00487

7 - - -

8 Philadelphia, Pennsylvania

9 Thursday, August 23, 2018

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12 Videotape deposition of E [REDACTED]
13 B [REDACTED], taken pursuant to notice, at the offices of
14 Ward Greenberg Heller & Reidy, LLP, 1835 Market
15 Street, Suite 650, Philadelphia, Pennsylvania, on
16 the above date, beginning at 10:04 a.m., before
17 Donna A. Bittner, RMR-CRR.

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20
21 DONNA A. BITTNER REPORTING
22 REGISTERED PROFESSIONAL REPORTERS
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24 Voorhees, New Jersey 08043
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(856) 768-6619

Donna A. Bittner Reporting

E [REDACTED] B [REDACTED]

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1 present time?

2 A. Yes.

3 Q. And is this the letter that you
4 described for us today as the one where you
5 told him that you were moving on with your
6 life, you weren't going to be trafficked
7 anymore and you wanted nothing further to do
8 with him?

9 A. Yes.

10 Q. And that's what you think this letter
11 said?

12 MR. BEZAR: Objection to the
13 form. Let me think for a second here.

14 Go ahead, you can answer.

15 THE WITNESS: In a way.

16 BY MR. GREENBERG:

17 Q. What do you mean "In a way"?

18 A. The type of person he was.

19 Q. I'm sorry?

20 A. The type of person he was. I had to
21 like kind of like work my way around him a
22 little bit because he was like very
23 controlling and manipulating. He was like
24 that. I did care about him. I did have

E [REDACTED] B [REDACTED]

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1 feelings for him. I mean, he was making sure
2 that I, you know, had funds provided to take
3 care of myself, so yes, I did.

4 Q. And it's also true that he gave you
5 marijuana while you were together?

6 A. Yes.

7 Q. Right? I think you told the police how
8 many times?

9 A. Six.

10 Q. Six times, and that was an estimate;
11 right?

12 A. Yes.

13 Q. You also had sex with him several times;
14 correct?

15 A. Yes.

16 Q. How many times?

17 A. I don't know.

18 Q. Did he force you to have sex with him?

19 A. No.

20 Q. You were underage, though?

21 MR. BEZAR: Hold on. She didn't
22 finish her answer.

23 THE WITNESS: He didn't physically
24 force me, but verbally, yes.